April 11, 2025

Secretary, Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: IN RE: Delete, Delete, Delete
GN Docket No. 25-133

Dear Secretary:

We are writing in response to the Federal Communications Commission request for comment on deregulatory initiatives and thank you for the opportunity to provide feedback.

Established in 1934, Suncoast Credit Union ("Suncoast") is a state-chartered credit union headquartered in the state of Florida with over $18 billion in assets, 79 branches, and serving 1.29 million members predominantly in the state of Florida. Credit unions are not-for-profit which allows us to put more back to our members and the communities we serve with various products and services including the convenience of debit card usage.

Suncoast is grateful for the opportunity to provide feedback to the Commission regarding its request for comment on identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens.

The request mentioned for respondents to consider the following:

- Cost-benefit considerations.
- Experience gained from the implementation of the rule.
- Marketplace and technological changes.
- Changes in the broader regulatory context.
- Changes in, or other implications of, the governing legal framework.
- Other considerations relevant to the retrospective review of Commission rules.

Suncoast encourages the continued efforts of the Commission towards collaborating to combat illegal spoofing, illegal robocalls, and fraudulent text messages. As you are aware, fraud is on the rise and these efforts will

help reduce fraudulent communications with our members. We support the development and implementation of standardized protocols, such as Rich Call Data, to enhance caller identification. With that said, we encourage the Commission to continue their efforts in relation to protecting the integrity of the communications system and ensure that any blocking or labeling efforts include safeguards to minimize false positives.

Although there are positive movements and collaboration above, there are also those that have a negative impact on the industry as well and cause unnecessary burdens to the financial industry and/or no longer meet their original intent such as the Telephone Consumer Protection Act.

The Telephone Consumer Protection Act (TCPA), enacted in 1991, was designed to reduce unwanted sales and telemarketing calls. While the original intent was to protect consumers, its current application to first-party creditors/collectors and financial institutions poses unintended challenges that hinder legitimate and essential communications with members. The TCPA was not designed to regulate communication between a financial institution and its members regarding a valid, existing debt wherein a contractual relationship was created. Applying the TCPA in these scenarios, wrongly classifies essential debt-related calls as nuisance calls.

When contact is limited, members lose the opportunity to work with credit unions on resolution options, especially for secured loans such as automobile or mortgage accounts. This puts the members' assets and the credit union's interest both at risk. The evolving nature of member communication (i.e., SMS, robocalls for fraud alerts and/or payment reminders) is hampered by vague TCPA definitions and outdated technology restrictions.

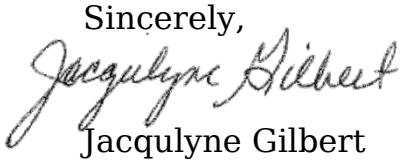
- **Validation of Cellular Number Ownership**. Although part of the TCPA, the requirement to validate against the Reassigned Number Database (RND) under the TRACED Act has placed an undue burden and substantial cost to those larger institutions. Mobile devices have been widely adopted for decades, and most members use mobile numbers as their primary, and often only, contact method. Although financial institutions can have their members sign documentation that they are the owner of the phone number provided, it should not require institutions to validate ownership or risk losing the safe harbor when the phone is transferred to another owner without notification to the institution. These steps provide limited actual protection for the consumers. Financial institutions make each call in good faith and do not benefit from dialing wrong numbers. The

purpose of calls is to those with an existing contractual relationship and institutions would remove the number from their records upon notification by the member or current owner that ownership has changed.

- **Revocation of Consent**. Rules relating to revocation of consent should be reviewed for more clarification statements as to what constitutes revocation. Although provided with specific terms that may trigger revocation, there are times wherein it is a challenge to determine the intent behind an ambiguous or unconventional reply. Example: If the text indicates reply "STOP" and the receiver does not utilize stop but some other word, the application may not recognize the intent since the exact word was not utilized. The Commission should review this requirement and shift the burden of proof to those claiming revocation to demonstrate the reasonableness of the revocation method.

Once again, thank you for the opportunity to comment on the Commission current initiatives towards deregulation where necessary but also encourage for collaboration on other items mentioned above, be continued. Please feel free to contact us for any further discussion.

Sincerely,



Jacqulyne Gilbert
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Suncoast Credit Union